



# California Regional Water Quality Control Board

## Santa Ana Region

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Arnold Schwarzenegger  
 Governor

M600540\_003941  
 MCAS EL TORO  
 SSIC NO. 5090.3.A

Linda S. Adams  
 Secretary for  
 Environmental Protection

November 13, 2006

Base Realignment and Closure  
 Attn: Mr. Darren Newton  
 BRAC Environmental Coordinator  
 7040 Trabuco Road  
 Irvine, California 92618

**COMMENTS ON FINAL GROUNDWATER MONITORING REPORT, MARCH 2006  
 MONITORING ROUND 23, FORMER MARINE CORPS AIR STATION, EL TORO,  
 SWRCB GEOTRACKER ID: DOD100136000, DOD100131200, DOD100131300,  
 DOD100131400, & DOD100139500**

Dear Mr. Newton:

We have reviewed the above referenced document, dated September 27, 2006, which we received on September 28, 2006. We have the following comments:

- **1.1 Objectives and Overview, IRP Site 1, 2<sup>nd</sup> paragraph, Page 1-1:** All the landfill sites at the former MCAS El Toro were appropriately included in this monitoring event, except Anomaly Area 3. Board staff believes that Anomaly Area 3 should be monitored in a similar manner as the other landfills. Therefore, we recommend and request that for the next monitoring event, Anomaly Area 3 be included and sampled for the contaminants of concern and appropriate general mineral parameters.
- **1.1 Objectives and Overview, IRP Site 1, 4<sup>th</sup> paragraph, Page 1-2:** This section states that several wells are present for monitoring of this site, and have been monitored during site investigation, with the contaminant of concern identified as perchlorate. Additionally, further groundwater evaluation is proposed to be conducted by utilizing a single monitoring well.

As you are aware, it is not standard or acceptable practice to use a single monitoring point to monitor a diffuse contaminant plume. At Site 1, this plume continues to migrate downgradient beyond the source area at concentrations above cleanup goals/levels. Note that the single well you are proposing as the future monitoring point represents the greatest concentration and source area for the release of perchlorate into groundwater at IRP Site 1.

We consider both metals and petroleum hydrocarbons as additional contaminants of concern at this site. We further believe that these contaminants require monitoring in groundwater and surface water at the site. Therefore, at a minimum, the site's

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two downgradient monitoring wells and the surface water monitoring location should be sampled, in addition to the proposed monitoring point, during all future monitoring events. The samples should be analyzed for the complete list of contaminants of concern, in order to accomplish a thorough evaluation of Site 1's contaminant plume.

The State Water Resources Control Board (SWRCB) has adopted regulations requiring the electronic submittal of information (ESI) for cleanup programs over the internet. Since January 1, 2005, parties responsible for cleanup at sites overseen by the Regional Board have been required to submit the following information electronically:

- groundwater analytical data;
- surveyed locations of monitoring wells;
- boring logs describing monitoring well construction, and;
- portable data format (PDF) copies of all reports.

Go to <http://geotracker.waterboards.ca.gov/> for information on obtaining a password, data format, and instructions for electronic submittal of information.

Please submit an electronic copy of subsequent reports and groundwater analytical data to the SWRCB GeoTracker website. For any questions, please call me at (951) 782-4494, or send email to [jbroderick@waterboards.ca.gov](mailto:jbroderick@waterboards.ca.gov).

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc via email: Richard Muza, U.S. EPA, Region 9  
Quang Than, DTSC, Office of Military Facilities  
Glenn Christensen, BRAC PMO WEST

